

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
HERETO TO DETERMINE WHETHER THIS OBJECTION
AFFECTS YOUR CLAIM(S)**

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
MOTORS LIQUIDATION COMPANY, et al.,	: 09-50026 (REG)
f/k/a General Motors Corp., et al.	:
Debtors.	: (Jointly Administered)
-----X	

NOTICE OF DEBTORS' 108TH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

PLEASE TAKE NOTICE that on September 23, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the “**Debtors**”), filed their 108th omnibus objection to expunge certain claims (the “**108th Omnibus Objection to Claims**”), and that a hearing (the “**Hearing**”) to consider the 108th Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **October 26, 2010 at 9:45**

a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE 108TH OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT “A” ANNEXED THERETO.

PLEASE TAKE FURTHER NOTICE that any responses to the 108th Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of

unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **October 19, 2010 at 4:00 p.m. (Eastern Time)** (the "**Response Deadline**").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the 108th Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the 108th Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
September 23, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors and
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
	:
-----X	

Chapter 11 Case No.
09-50026 (REG)
(Jointly Administered)

DEBTORS' 108TH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE
EXHIBIT ANNEXED TO THIS OBJECTION.**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) (“**MLC**”) and
its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), respectfully
represent:

Relief Requested

1. The Debtors file this 108th omnibus objection to certain claims (the “**108th Omnibus Objection to Claims**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], and this Court’s order approving the procedures relating to the filing of proofs of claim (the “**Bar Date Order**”) [Docket No. 4079], seeking entry of an order disallowing and expunging the claims listed on **Exhibit “A”** annexed hereto.¹

2. The Debtors have examined the proofs of claim identified on Exhibit “A” and have made every effort to ascertain the validity of such claims. In fact, prior to the filing of this 108th Omnibus Objection to Claims, the Debtors sent a letter to each of the claimants listed on Exhibit “A” requesting information that would permit the Debtors to understand the basis and nature of their respective proofs of claim. To date, the Debtors have not received any response.

3. After careful review, the Debtors have determined that the proofs of claim listed under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “**Claims with Insufficient Documentation**”) fail to provide sufficient documentation to ascertain the validity of such claims. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Bar Date Order, the Debtors seek entry of an order disallowing and expunging from the claims register the Claims with Insufficient Documentation. Further, the Debtors

¹ Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, www.motorsliquidation.com. A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

reserve all of their rights to object on any other basis to any Claims with Insufficient Documentation as to which the Court does not grant the relief requested herein.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

5. On June 1, 2009, four of the Debtors (the “**Initial Debtors**”)² commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the “**Realm/Encore Debtors**”)³ commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.

6. On September 16, 2009, this Court entered an order [Docket No. 4079] establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors’ cases, including governmental units. On December 2, 2009, this Court entered an order [Docket No. 4586] establishing February 1, 2010 as the deadline for each person or entity to file a proof of claim in the Realm/Encore Debtors’ cases (except

² The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

³ The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim).

7. Furthermore, on October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The Relief Requested Should Be Approved by the Court

8. A proof of claim *must* “set forth the facts necessary to support the claim” for it to receive the prima facie validity accorded under the Bankruptcy Rules. *In re Chain*, 255 B.R. 278, 280 (Bankr. D. Conn. 2000) (internal quotation omitted); *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988); *see Ashford v. Consol. Pioneer Mortgage*, 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995), *aff’d*, 91 F.3d 151 (9th Cir. 1996); *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

9. The Claims with Insufficient Documentation fall far short of the standard unambiguously required in the Bar Date Order. Indeed, the Bar Date Order, requires, among other things, that a proof of claim must “set forth with specificity the legal and factual basis for the alleged [c]laim [and] include supporting documentation or an explanation as to why such documentation is not available.” (Bar Date Ord. at 2.)⁴

10. The Debtors have examined the proofs of claim identified on Exhibit “A” and have determined that the proofs of claim listed under the heading “*Claims to be Disallowed*

⁴ Notices of the Bar Date Order contained express references to this requirement.

and Expunged’ do not include sufficient documentation to ascertain the nature or validity of these claims. A reasonable opportunity was provided to each claimant to rectify the deficiencies. Thus, the Debtors request that the Court disallow and expunge in their entirety the Claims with Insufficient Documentation.

Notice

11. Notice of this 108th Omnibus Objection to Claims has been provided to each claimant listed on Exhibit “A” and parties in interest in accordance with the Fourth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated August 24, 2010 [Docket No. 6750]. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

12. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York
September 23, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ARTHUR WIGGINS 885 HIGHWAY 2393 MONTICELLO, KY 42633	9263	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BATSON, OMAR R 5337 BUTTERNUT TREE CT FLINT, MI 48532	65289	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BETTY DAVIS 3481 NILES CORTLAND RD. LT28 CORTLAND, OH 44410	9289	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BLEVINS JR, LOUIS 1831 MILLSBORO RD MANSFIELD, OH 44906	60770	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BOIKE, JACOB F 308 MAPLEBROOKE LN CADILLAC, MI 49601	11348	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BRITTENHAM #252929, DENNIS E GUS HARRISON ARF CORRECTIONAL FACILITY 2727 E. BEECHER ST ADRIEN, MI 49221	8287	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BURKS, DORIS T 314 NELSON ST PONTIAC, MI 48342	10490	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BUSCH, BERNARD E 8 HIDDEN TRL LANCASTER, NY 14086	8186	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CINDERELLA F HARDY 51 TRACE LANE SHELBYVILLE, KY 40065	12545	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CINDERELLA HARDY 51 TRACE LN SHELBYVILLE, KY 40065	12544	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
CONNOLLY, MICHAEL F 3584 ORCHARD HILL DR CANFIELD, OH 44406	8021	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CORNELIA M PHILLIPS 1415 TANNER LN WINTER SPRINGS, FL 32708	9178	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CORNELIA PHILLIPS 1415 TANNER LN WINTER SPRINGS, FL 32708	9177	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CRAGUN, MAURICE G 8616 W 10TH ST APT 402 INDIANAPOLIS, IN 46234	12768	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CUNNINGHAM, ROBERT A 14707 NORTHVILLE RD APT 216 PLYMOUTH, MI 48170	8411	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DARELYN CLAUSE 5380 CHEW RD SANBORN, NY 14132	6146	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
DARELYN R CLAUSE 5380 CHEW RD SANBORN, NY 14132	6147	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
DAVID HOUGHTON 2012 S. COCHRAN AVE CHARLOTTE, MI 48813	16149	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
DAVIS, BETTY N 3481 NILES CORTLAND RD LT28 CORTLAND, OH 44410	9288	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
DOWNES, CAROL D 1732 CRANBERRY LN NE APT 165 WARREN, OH 44483	11178	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
EUGENE GEARTY 16731 US HIGHWAY 301 LOT 145 DADE CITY, FL 33523	45271	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
FRANK, MILAN C 653 BORKU JABLONNENO 56164 CZECH REPUBLIC , CZECH (REP)	32899	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GAERTNER, BETTY B TUSCANY AT MC CORMICK RANCH #302 9000 E SAN VICTOR DRIVE SCOTTSDALE, AZ 85258	6161	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GAIL D CROLEY 2125 MEADOW LANE ARCANUM, OH 45304	30907	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GERY, JOHN D 2325 S CARBON ST ALLENTOWN, PA 18103	8419	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HALL, CURTIS 2608 GRADY CT FLINT, MI 48505	61712	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HALLENBECK, ANN M 8780 W CUTLER RD DEWITT, MI 48820	8800	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HARDY, BOBBY R PO BOX 1441 HIRAM, GA 30141	33283	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HAYLES, LOYD T 331 COUNTRY CLUB BLVD SLIDELL, LA 70458	32902	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
IORIO, JOHN M 251 ORCHARD CREEK LN ROCHESTER, NY 14612	36137	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JIMMY L WHITE 4943 FREE PIKE DAYTON, OH 45416	5960	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
KARAS, PAUL B 14004 12TH AVE MARNE, MI 49435	6049	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
KELLEY, BRENDA J 593 TIMBERLINE ST DECATUR, AR 72722	7749	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
KREZ, LEO V 5797 MYSTIC BND BROWNSVILLE, TX 78526	6086	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
KUMMER, DAVID H 2653 BLUE STONE CIRCLE KALAMAZOO, MI 49009	11267	MLCS, LLC	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
LEVON MANN SR 1837 AUBURN AVE DAYTON, OH 45406	8709	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
LOUDON, ELIZABETH M 9146 GREGORY ST CYPRESS, CA 90630	6260	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MANN SR, LEVON (NMI) 1837 AUBURN AVE DAYTON, OH 45406	8710	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MARIANNE SPEED 705 MEADOWLANE DR RIPLEY, OH 45167	8403	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MARK S MATLINGA 111 S BASSETT RD LAPEER, MI 48446	6047	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MC CANN, DAVID M 6238 WINDORAH WAY ORANGEVALE, CA 95662	9274	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MCDONALD, ISABEL G 125 DOYLE FARM LN MOORESVILLE, NC 28115	10956	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MCELYEA, JAMES W 3210 NORTHWEST GRAND AVE. PHOENIX, AZ 85017	7516	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MICHALSKI, HELEN A 2013 RIDGEVIEW LN SENECA, SC 29678	36988	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MOORE-FULLER, STEPHANIE S 2011 CALIFORNIA ST APT 6A MOUNTAIN VIEW, CA 94040	47996	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
			Unliquidated		

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MORGAN, RUSSELL R 9808 COUNTY ROAD 528 BURLESON, TX 76028	2686	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
NEWMAN, MICHAEL P 1978 LOVELL CT MILFORD, MI 48381	61360	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PATTON, FLOSSIE 345 N UPLAND AVE DAYTON, OH 45417	8711	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PAYNE, MONICA M 60920 ROMEO PLANK RD RAY, MI 48096	33537	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PERCIVAL, MADELIN 35 WILDWOOD CIR FLETCHER, NC 28732	9156	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
RANDOLPH BERTIE PO BOX 405 BETHEL, OH 45106	8010	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
RANDOLPH BERTIE PO BOX 405 BETHEL, OH 45106	8027	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
RANDOLPH, BERTIE PO BOX 405 BETHEL, OH 45106	8009	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROBERT K FOSTER 7226 TERUEL AVE NEW PORT RICHIE, FL 34653	6380	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROBERT SEXTON JR 3304 EVERGREEN DR BAY CITY, MI 48706	7974	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ROBINSON, EVELYN H 4223 OLD BRANDON RD PEARL, MS 39208	8691	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROSE JUNGNETSCH 15250 W TOWNLINE RD SAINT CHARLES, MI 48655	12518	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROSINE, MARVIN L 507 LARCHMONT PL AIKEN, SC 29801	8594	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROSS, EVERETT P 10045 NICARAGUA DR CUTLER BAY, FL 33189	11166	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROSSI, ELVERA M C/O DEBRA D ROSSI 6950 FAIRVIEW RD AUSTINTOWN, OH 44515	6409	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SAYLOR, JIMMY R 5629 MACEY AVE APT S1 CINCINNATI, OH 45227	39329	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SEELow, JOAN E W4337 COUNTY RD S TRLR 59 HORICON, WI 53032	33523	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SHAVON E EVANS 2460 BRIER ST SE WARREN, OH 44484	9283	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SMITH, BARBARA 3 WESTGATE DR GRANITE CITY, IL 62040	9287	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SPEED, MARIANNE 705 MEADOWLANE DR RIPLEY, OH 45167	8005	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
STEPHEN JOHNSON 18548 MYRON ST LIVONIA, MI 48152	44067	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
STEWART GEORGE 11 BUNKER LN THORNDALE, PA 19372	33292	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
TRISTANO, CARL F 518 PHEASANT TRL ST CHARLES, IL 60174	43332	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
VANCE, LUNZIE L 5070 VILLAGE WOODS DR APT 3 MEMPHIS, TN 38116	8708	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WARNER, CRAIG G 47 HAZEL ST DANVILLE, AL 35619	45071	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
WILCOX, RICHARD 14130 W 113TH TER LENEXA, KS 66215	8106	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WILLIAM R FREEMAN 735 GRISWOLD ST SE GRAND RAPIDS, MI 49507	6207	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WILLIAMS, IVAN V 1601 NW 103RD ST APT 276 MIAMI, FL 33147	9271	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WYSONG, MARY B 6500 LUCAS LANE RR=4 HILLSBORO, OH 45133	9773	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
CLAIMS TO BE DISALLOWED AND EXPUNGED	74		\$0.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$0.00 (T)		

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

ORDER GRANTING DEBTORS' 108TH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

Upon the 108th omnibus objection to expunge certain claims, dated September 23, 2010 (the “**108th Omnibus Objection to Claims**”),¹ of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order disallowing and expunging the Claims with Insufficient Documentation on the grounds that such claims fail to provide sufficient documentation to ascertain the validity of the claim, all as more fully described in the 108th Omnibus Objection to Claims; and due and proper notice of the 108th Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the 108th Omnibus Objection to Claims.

108th Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the 108th Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the 108th Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit “A”** (the “**Order Exhibit**”) annexed hereto under the heading “*Claims to be Disallowed and Expunged*” are disallowed and expunged from the claims registry; and it is further

ORDERED that, if applicable, the 108th Omnibus Objection to Claims is adjourned with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Adjourned*” (the “**Adjourned Claims**”) to the date indicated on the Order Exhibit, subject to further adjournments (such actual hearing date, the “**Adjourned Hearing Date**”), and the Debtors’ response deadline with respect to the Adjourned Claims shall be 12:00 noon (Eastern Time) on the date that is three (3) business days before the Adjourned Hearing Date; and it is further

ORDERED that, if applicable, the 108th Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Withdrawn*”; and it is further

ORDERED that, if applicable, the 108th Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Claim Withdrawn*” as those claims have been withdrawn by the corresponding claimant; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim listed on Exhibit "A" annexed to the 108th Omnibus Objection to Claims under the heading "*Claims to be Disallowed and Expunged*" that is not disallowed or expunged pursuant to this Order; and it is further

ORDERED that to the extent a disallowed and expunged claim is a workers' compensation claim with respect to an employee residing or employed in any state other than the states of Alabama, Georgia, New Jersey, and Oklahoma, the disallowance of such claim shall not affect the claimant's rights to continue receiving benefits from General Motors, LLC (f/k/a NGMCO, Inc.), the purchaser of substantially all the assets of General Motors Corporation; and it is further

ORDERED that to the extent a disallowed and expunged claim is for principal under a public debt security issued by the Debtors, the disallowance of such claim shall not affect the right of the claimant to participate in recoveries as a holder of securities under any proof of claim filed by an indenture trustee in respect of the subject issuance; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
_____, 2010

United States Bankruptcy Judge